

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DUANE E. NORMAN, SR., on behalf of
himself and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

No. 2:18-cv-05225-GAM

DECLARATION OF JAMES A. FRANCIS

I, James A. Francis, pursuant to 28 U.S.C. § 1746, hereby declare under the penalty of perjury as follows:

1. I am an attorney and founding shareholder of the firm of Francis Mailman Soumilas, P.C. and one of the lawyers representing Plaintiff and the Class in this matter. I make the following declaration based upon my personal knowledge, and if I were called upon to testify to it, I would do so competently.

2. Attached hereto as Exhibit 1 is a true and accurate copy of Defendant Trans Union, LLC's March 4, 2019 FED. R. 26(a)(1) Initial Disclosures.

3. Attached hereto as Exhibit 2 is a true and accurate copy of Defendant Trans Union, LLC's February 14, 2022 Supplemental FED. R. CIV. P. 26(a)(1) Disclosures.

4. Attached hereto as Exhibit 3 is a true and accurate copy of Defendant Trans Union, LLC's February 16, 2022 Supplemental FED. R. CIV. P. 26(a)(1) Disclosures.

5. Attached hereto as Exhibit 4 is a true and accurate copy of correspondence dated February 18, 2022 from Plaintiff's counsel to Defendant's counsel.

6. Attached hereto as Exhibit 5 is a true and accurate copy of email correspondence dated from January 21, 2022 to February 2, 2022 among counsel for the parties.

7. Attached hereto as Exhibit 6 is a true and accurate copy of email correspondence dated February 16, 2022 from Plaintiff's counsel to Defendant's counsel.

8. Attached hereto as Exhibit 7 is a true and accurate copy of email correspondence dated February 16, 2022 from Defendant's counsel to counsel for the parties.

9. Attached hereto as Exhibit 8 is a true and accurate copy of the transcript of the April 14, 2022 deposition of Ahunya Tilghman.

10. Attached hereto as Exhibit 9 is a true and accurate copy of Jonathan Jaffe's April 15, 2022 reply report.

11. Attached hereto as Exhibit 10 is a true and accurate copy of email correspondence dated May 4, 2022 from Defendant's counsel to Plaintiff's counsel.

12. Attached hereto as Exhibit 11 is a true and accurate copy of the transcript of the May 5, 2022 deposition of David Lasater.

13. Attached hereto as Exhibit 12 is a true and accurate copy of the transcript of the April 11, 2022 deposition of Michael Turner.

14. Attached hereto as Exhibit 13 is a true and accurate copy of the transcript of the April 20, 2022 deposition of John Ulzheimer.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17, 2022.

/s/James A. Francis
James A. Francis